

**IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF MARYLAND
Greenbelt Division**

IN RE: Health Management Resources, Inc.	* * * * *	CASE: 05-12871NVA CHAPTER 11
DEBTOR(S)		

**DEBTOR'S COUNSEL'S MOTION TO RECONSIDER
AND REQUEST FOR AN OPPORTUNITY FOR HEARING**

COMES NOW, the Debtor(s), HEALTH MANAGEMENT RESOURCES, by and through undersigned counsel, and respectfully requests that this Honorable Court strike its Order Directing Debtor's Counsel to Refund All Fees and for reasons states as follows:

1. That Debtor's Counsel filed a Chapter 11 bankruptcy on behalf of the Debtor on February 9, 2005.
2. The Chapter 11 bankruptcy filing was made by Bruce Richardson, Esquire of Weinstock, Friedman & Friedman, P.A., through electronic filing, utilizing undersigned counsel's name as counsel of record. The Petition was prepared by Mr. Richardson, an associate in this office.
3. Mr. Richardson has apparently been suffering from depression and other related problems, and this was unknown to me or to this firm.
4. Mr. Richardson was receiving all court notices and failed to disclose the Order directing the filing of the disclosure statement within eight (8) days.
5. Mr. Richardson is no longer employed by this office and is believed to be undergoing medical treatment for his health problems.
6. Attached hereto is the Disclosure Compensation of Attorney for Debtor required by the rules and requested by this Court.

7. Debtor will not be prejudiced by the granting of this request. The fees are reasonable and were earned in advance of the filing of the bankruptcy petition as part of pre bankruptcy planning and advice performed by Mr. Richardson.

WHEREFORE, the Debtor, Health Management Resources, respectfully requests:

A. That Order Directing Debtor's Counsel to Refund All Fees be STRICKEN;

B. That hearing be set in this matter; and

C. For such other and further relief as the nature of this cause may require.

RESPECTFULLY REQUESTED:

/s/ Leonard Tober
Leonard Tober, Esquire
**WEINSTOCK, FRIEDMAN &
FRIEDMAN, P.A.**
4 Reservoir Circle
Baltimore, Maryland, 21208
410-559-9000
counsel for debtor

REQUEST FOR A HEARING

Debtors respectfully requests a hearing in open court.

/s/ Leonard Tober
Leonard Tober

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 9 day of March, 2005 a copy of the foregoing Debtor's Motion to Reinstate was mailed, first class, postage prepaid to:

US Trustee
6305 Ivy Lane
Greenbelt, MD 20770

Debtor

/s/ Leonard Tober
Leonard Tober